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7 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,  
9 Plaintiff,  
10 vs.  
11 CONSTANCE FENTON,  
12 Defendant.

Case No. 2:12-cr-400-JAD-GWF-3

**STIPULATION TO EXTEND  
SURRENDER DATE TO ALLOW  
FOR MEDICAL TREATMENT**

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14 COMES NOW the Defendant, CONSTANCE FENTON, by and through her counsel of  
15 record, MICHAEL R. PANDULLO, ESQ., and pursuant to stipulation by the parties as set forth  
16 below, hereby requests that this Honorable Court extend the Defendant's surrender date to allow  
17 for medical treatment. In support hereof, the Defendant gives the Court to understand as  
18 follows:

19 1. On October 24, 2012 the United States filed a 20-count Indictment charging Ms.  
20 Fenton and her co-defendants with various crimes relating to an investment scheme.

21 2. On September 17, 2014, Ms. Fenton entered a plea of guilty to Count 9 of the  
22 Indictment, Conspiracy to Commit Money Laundering (18 USC §1956(h)).

23 3. This matter came before the Court for sentencing on March 2, 2015. With respect to  
24 incarceration, the Court ordered Ms. Fenton to serve 6 months incarceration in the U.S. Bureau  
of Prisons (BOP), followed by 3 years of supervised release, the first 6 months to be spent on  
home detention.

4. The Court provided Ms. Fenton with a self-surrender date of June 2, 2015.

5. During her annual mammogram on March 11, 2015, doctors discovered a tumor in Ms. Fenton's right breast. The tumor is cancerous and must be removed. She is scheduled to visit with her surgeon on June 1, 2015 to set the date of the lumpectomy. Once the results are known, her physicians can advise regarding the need for additional treatment.

6. Ms. Fenton is requesting a 30-day extension of her June 2, 2015 surrender date to allow time for her lumpectomy surgery to be performed and the results evaluated.

7. The Assistant United States Attorney stipulates to the extension.

WHEREFORE, the Defendant requests that this Honorable Court extend her surrender date of June 2, 2015 for a period of 30 days.

RESPECTFULLY SUBMITTED this 29<sup>th</sup> day of May, 2015.

MICHAEL R. PANDULLO, Esq.

/s/ Michael R Pandullo

MICHAEL R. PANDULLO, Esq.

*Attorney for Defendant Constance Fenton*

STIPULATED AND AGREED TO:

/s/ Steven W Myhre  
STEVEN W. MYHRE, ESQ.  
Assistant United States Attorney

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7 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,  
9 Plaintiff,  
10 vs.  
11 CONSTANCE FENTON,  
12 Defendant.

Case No. 2:12-cr-400-JAD-GWF-3

**ORDER TO EXTEND  
SURRENDER DATE TO ALLOW  
FOR MEDICAL TREATMENT**

13 THIS MATTER having come before the Court upon the Stipulation of the parties  
14 submitted by the Defendant, CONSTANCE FENTON, by and through her counsel of record,  
15 MICHAEL R. PANDULLO, ESQ., and good cause appearing, the Court hereby finds as  
16 follows:

17 1. On October 24, 2012 the United States filed a 20-count Indictment charging Ms.  
18 Fenton and her co-defendants with various crimes relating to an investment scheme.

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24 4. The Court provided Ms. Fenton with a self-surrender date of June 2, 2015.

1       5. During her annual mammogram on March 11, 2015, doctors discovered a tumor in  
2 Ms. Fenton's right breast. The tumor is cancerous and must be removed. She is scheduled to  
3 visit with her surgeon on June 1, 2015 to set the date of the lumpectomy. Once the results are  
4 known, her physicians can advise regarding the need for additional treatment.

5       6. Ms. Fenton is requesting a 30-day extension of her June 2, 2015 surrender date to  
allow time for her lumpectomy surgery to be performed and the results evaluated.

6       7. The Assistant United States Attorney stipulates to the extension.

7       THEREFORE, IT IS HEREBY ORDERED, that the Defendant's request to extend her  
8 surrender date of June 2, 2015 for a period of 30 days is hereby GRANTED.

9       IT IS FURTHER ORDERED that the Defendant shall surrender for service of sentence  
10 at the institution designated by the Bureau of Prisons:

11        by 12:00 Noon on July 2, 2015.

12        as notified by the United States Marshal.

13        as notified by the Probation or Pretrial Services Office.

14       15 ORDERED this 29th day of May, 2015.

16       17 BY THE COURT

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20       21 U.S. DISTRICT JUDGE

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